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Tamara Giwa
Executive Director

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April 11, 2024

By ECF and e-mail

Honorable Denise Cote United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re:

United States v. Jefrey Sanchez-Reyes, 19 Cr. 502 (DLC)

Dear Judge Cote:

I write to respectfully request that the Court permit the Probation Office to provide counsel with information concerning the results of Mr. Sanchez-Reyes' drug tests between November 21, 2022 and the present. Specifically, I am requesting (1) a list of all drug tests and the results, whether performed at the treatment program or at the Probation Office; and (2) the toxicology reports for the three most recent tests.

A conference has been scheduled for April 16, 2024 to discuss Mr. Sanchez-Reyes's substance use, and the information will help counsel prepare for that conference. I have contacted the Probation Office to request the first item above, and was informed that a Court Order was required in order for it to share the information.

Thank you for your consideration of this request,

Respectfully submitted,

/s/

Martin Cohen Ass't Federal Defender 646-588-8317

cc. Alexandra Rothman, Esq., by e-mail and ECF
James Mandlik, Esq., by e-mail
Karen Rosero, U.S. Probation Office, by e-mail
Hillel Greene, U.S. Probation Office, by e-mail

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